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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Telecommunications Relay Services and Speech-to-Speech
Services for Individuals with Hearing and Speech Disabilities,
CC Docket No. 98-67

Dear Ms. Salas:

On March 6, 2000, the Commission released its Report and Order and Further Notice of Proposed Rulemaking (FCC 00-56) ("Order") in the above-referenced rulemaking, prescribing substantial modifications to current operational standards for Telecommunications Relay Service ("TRS"). Paragraph 154 of the Commission's Order would make the rule changes mandating those revisions effective thirty (30) days after Federal Register publication of a summary of the Order. In light of the substantial impact that the prescribed changes would have on TRS providers' staffing and systems, AT&T believes that the thirty day period would be inadequate for compliance with the requirements adopted in the Order, and that a significantly longer period should be allowed for implementation of those rule changes.

For example, the Order (§§ 59-66) modifies the speed of answer requirement to provide that 85 percent of all calls must be answered within ten seconds "by any method which results in the TRS callers' call being placed," requires measurement of a provider's compliance with that standard on a daily basis, and requires the inclusion of abandoned calls in the compliance calculation. Although AT&T is still evaluating the full operational implications of these modifications, it is already apparent that its TRS centers' staffing will need to be increased.¹ In the

¹ The impact of these changes in the speed of answer standards would be especially acute for calls types such as video relay, speech-to-speech and Spanish language relay calls. The Commission's newly-adopted requirements

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current economic climate characterized by low unemployment among persons with the skills required to function as Communications Assistants ("CAs"), AT&T is already experiencing difficulty in finding qualified CAs; hiring to meet increased staffing requirements will pose an additional serious problem unless (and even if) the date for compliance with those rule changes is deferred from the current schedule.²

Additionally, clarification and/or reconsideration by the Commission of various aspects of the revised operational standards prescribed in the Order are likely to be required. Under Sections 1.4 and 1.429 of the Commission's Rules (47 C.F.R. §§ 1.4 and 1.429), petitions for such relief would be due on the same date that the rules take effect. This schedule would not allow the Commission to consider and address these concerns prior to the time that the modifications in operational standards must be implemented by TRS providers.

For these reasons, AT&T urges the Commission to defer the effective date for the rule changes adopted in its order for at least six months. This interval will allow TRS providers fully to analyze the rule changes and to implement staffing and systems changes needed to comply with those revisions, as well as for the Commission to clarify and/or reconsider the changes in adopted in the Order to the extent that may be necessary.

Respectfully submitted,



Attachment

cc: Debra Sabourin
Karen P. Strauss

on in-call replacement of CAs (Order ¶¶ 67-71) will also necessarily impact TRS providers such as AT&T whose CAs are covered by collective bargaining agreements that govern matters such as shift changes and scheduled breaks.

² TRS providers such as AT&T will also need to assess how the modifications in operational standards on speed of answer adopted in the Order may impact on the providers' ability to fully utilize call automation technologies that could effectively reduce the overall set-up time for TRS calls. See Attachment A, previously presented at the Commission's March 10, 2000 Public Forum on TRS.

Attachment A

Average Speed of Answer versus Far-Party Answer: Which is the Better Quality Metric?

*Prepared for the FCC Public Forum
March 10, 2000*

Burt J. Bossi
Product Manager
AT&T TRS

Average Speed of Answer, or “ASA,” has been institutionalized as a quality metric for TRS providers, and is one of the few objective service measurements in our industry. But is it the right metric for advancing Telecommunication Relay Service, and providing the most functionally equivalent telephony experience?

Essentially, Average Speed of Answer (Article 21²; Docket No. 90-571) is a time-stamp indicator, measuring the amount of time it takes a caller to connect with the Relay Center, or a Communication Associate (CA). Although ASA is fundamentally a good baseline metric, it only measures the first half of a relay call. This measurement ignores the longest portion of the call set-up, the second leg of a relay call which is originated by a CA and terminates at the “far-party.” We call this “*Far-Party Answer (FPA)*” performance. For AT&T, *FPA* is also a time-stamp indicator. It includes ASA, call setup, dialing, and ringing. In essence, it measures the difference between relay and non-relay service.

Let’s reflect a moment on the bigger picture. Envision the ideal relay system; an automated system that provides (at least) speech-to-text and text-to-speech flawlessly. A system and an interconnect much like a voice call today. No CAs, no call centers, and no management overhead. A free service that is part of a bundled offer with your favorite Internet Service Provider. Technocrats agree that as the Internet and associated software and hardware matures, ubiquitous multimedia connectivity to each home will no longer stretch the imagination or the checkbook. It is just a matter of time.

While you’re pondering this holistic relay service, and ask yourself a few questions:

² The Commission, in the NPRM, proposed that 85% of all calls be answered within 10 seconds and that relay service begins within 30 seconds of answering. Thus, for 85% of all calls, the actual transfer of information begins within 40 seconds. The speed of answer criteria applies only to TRS, and is independent of network performance. In general, the common carriers commenting on this issue favor some relaxation of the proposed answer time, while other comments either concur with the proposed rule or request more rigorous response requirements.

*Do I use relay to talk to a CA, or to talk to person(s) I'm calling?
Do I know what my State's Far-Party Answer time is?
Can my provider tell me?*

It is naturally more appealing for TRS advocates and providers alike to talk about answering 85% or 90% of the customer base in ten (10) seconds or less, with an impressive ASA approaching the three (3) second barrier. It is worth mentioning that providers rarely have difficulty in meeting these ASA requirements. It is much less impressive to speak about average *Far-party Answer* times, which often approach the one-minute mark. Obviously, there is room for improvement. Yet we continue to see more concern with ASA, even though this metric is not a guarantee for far-party connect time, and may in fact, may actually get us there later.

Over the past several years, AT&T has spent a significant amount of engineering effort taking sure-footed steps toward this utopian relay vision. We have been experimenting with technologies that provide automation during a TRS call while offering users more call control – and more independence. As a by-product, this technology minimizes CA intervention, and reduces unit cost. In 1997, AT&T introduced data *Up-Front Automation*, followed by *Back-End Automation* in 1998. In 1999, *Voice Up-Front Automation* was provided. In 2000, in association with a National 7-1-1 Access, AT&T will enhance this automation further. As always, this automation is tailored to the specific needs of each State.

With AT&T's Up-Front Automation, voice and data users have the choice of spending a few extra seconds setting up their call. In turn, this up-front investment will save Baudot users 8.5 seconds, TurboCode® users will save 10.6 seconds, and voice customers will save 12.0 seconds on the *Far-Party Answer* performance³. About 70% of all originating calls use enhanced automation techniques because they provide quicker connectivity.

Because AT&T has witnessed such significant time savings with this technology, we urge the Commissions at the State and National levels to re-evaluate current quality measures, and to consider adopting *Far-Party Answer* as a new, more aggressive measurement to provide the best Telecommunication Relay Services possible.

³ This data is a random aggregate of all calls completed through the AT&T TRS complex, March 3, 2000.